

GNSO Council Recommendations Report to the Board for the adoption of the Translation and Transliteration of Contact Information PDP Working Group Recommendations

1. Executive Summary

The Generic Names Supporting Organization (GNSO) unanimously [approved](#) at its meeting on 24 June 2015 the [Final Report](#) containing seven recommendation and is now seeking ICANN Board review and approval.

The Translation and Transliteration of Contact Information Policy Development Process (PDP) Working Group (the “Working Group”) is concerned with the way that contact information data – commonly referred to as ‘Whois’ – are collected and displayed within generic top-level domains (gTLDs). According to the [Charter](#) (see also Annex A), the Working Group “is tasked to provide the GNSO Council with a policy recommendation regarding the translation and transliteration of contact information. As part of its deliberations on this issue, the Working Group should, at a minimum, consider the following two issues:

- Whether it is desirable to translate contact information to a single common language or transliterate contact information to a single common script?
- Who should decide who should bear the burden [of] translating contact information to a single common language or transliterating contact information to a single common script?

The recommendations address the first Charter question; the [Final Report](#) also contains an observation (but no recommendations) in relation to the second of the aforementioned Charter question.

The policy recommendations, if approved by the Board, will impose obligations on contracted parties. The GNSO Council’s unanimous vote in favor of these items exceeds the voting threshold required at Article X, Section 3.9.f of the ICANN Bylaws regarding the formation of consensus policies.

Under the ICANN Bylaws, the Council’s supermajority support for the motion¹ obligates the Board to adopt the recommendations unless by a vote of more than two-thirds, the Board determines that the policy is not in the best interests of the ICANN community or ICANN.

First Charter Question: Whether it is desirable to translate contact information to a single common language or transliterate contact information to a single common script.

¹ The motion was [passed unanimously](#) by the GNSO Council.

***Recommendation #1** The Working Group recommends that it is not desirable to make transformation of contact information mandatory. Any parties requiring transformation are free to do so on an *ad hoc* basis outside Whois or any replacement system, such as the Registration Data Access Protocol (RDAP). If not undertaken voluntarily by registrar/registry (see Recommendation #5), the burden of transformation lies with the requesting party.

Recommendation #2 Whilst noting that a Whois replacement system should be capable of receiving input in the form of non-ASCII script contact information, the Working Group recommends its data fields be stored and displayed in a way that allows for easy identification of what the different data entries represent and what language(s)/script(s) have been used by the registered name holder.

Recommendation #3 The Working Group recommends that the language(s) and script(s) supported for registrants to submit their contact information data may be chosen in accordance with gTLD- provider business models.

Recommendation #4 The Working Group recommends that, regardless of the language(s)/script(s) used, it is assured that the data fields are consistent to standards in the Registrar Accreditation Agreement (RAA), relevant Consensus Policy, Additional Whois Information Policy (AWIP) and any other applicable policies. Entered contact information data are validated, in accordance with the aforementioned Policies and Agreements and the language/script used must be easily identifiable.

Recommendation #5 The Working Group recommends that if the transformation of contact information is performed, and if the Whois replacement system is capable of displaying more than one data set per registered name holder entry, these data should be presented as additional fields (in addition to the authoritative local script fields provided by the registrant) and that these fields be marked as transformed and their source(s) indicated.

Recommendation #6 The Working Group recommends that any Whois replacement system, for example RDAP, remains flexible so that contact information in new scripts/languages can be added and expand its linguistic/script capacity for receiving, storing and displaying contact information data.

Recommendation #7 The Working Group recommends that these recommendations are coordinated with other Whois modifications where necessary and are implemented and/or applied as soon as a Whois replacement system that can receive, store and display non-ASCII characters, becomes operational.

Second Charter Question: Who should decide who should bear the burden translating contact information to a single common language or transliterating contact information to a single common script.

Finding in relation to second Charter question Based on recommendations #1-#7, the question of who should decide who should bear the burden of translating or transliterating contact information to a single common script is moot.

*Recommendation 1 was accompanied by a **Minority Statement**, reading as follows:

Working Group member Petter Rindforth, in line with the position taken by his Constituency, the Intellectual Property Constituency (ICP),² recommends mandatory translation and/or transliteration (transformation) of contact information in all generic top-level domains (gTLDs).

Although he agrees that there are situations where the contact information in the local language of the registrant is the primary version, such as to identify the registrant in preparation for a local legal action, there are a number of situations where a global WHOIS search, providing access to data in as uniform a fashion as possible, is necessary for the data registration service to achieve its goals of providing transparency and accountability in the DNS. See also 5.1.1 [of the Final Report] explaining the Working Group's arguments supporting mandatory transformation of contact information in all generic top-level domains.

2. If a Successful GNSO Vote was not reached, a clear statement of all positions held by Council members. Each statement should clearly indicate (i) the reasons underlying each position and (ii) the constituency(ies) or Stakeholder Group(s) that held that position.

N/A

3. An analysis of how the issue(s) would affect each Constituency or Stakeholder Group, including any financial impact on the constituency or Stakeholder Group.

Any policy recommendation regarding the translation and transliteration of contact information will affect a number of Constituencies and Stakeholder Groups and all those listed below were adequately represented during the Working Group phase of the PDP that led to the recommendations.

Registrar Stakeholder Group (RrSG)

² see also 5.1.1 and the Public Comment Review Tool (Annex B).

Registrars are at the frontline of collecting contact information from registrants for it is them that registrants interact when registering a domain name. Recommendation 3 clearly states ‘that the language(s) and script(s) supported for registrants to submit their contact information data may be chosen in accordance with gTLD- provider business models’, meaning that it is up to the Registrar to decide which languages and script they support. This will allow for market forces to determine which breadth of choices are offered by registrars. Crucially, allowing for contact information registration in script/languages difference than US ASCII, does not reduce any contractual obligations for registrars as the Group states that ‘data fields are consistent to standards in the Registrar Accreditation Agreement (RAA), relevant Consensus Policy, Additional Whois Information Policy (AWIP) and any other applicable polices. Entered contact information data are validated, in accordance with the aforementioned Policies and Agreements [...]’. The Working Group has not assessed any financial impacts because offering registrants to register domain names in different scripts/languages would be a business decision to be taken by each Registrar individually.

Registry Stakeholder Group (RySG)

Registries – at least in thick registry models³ - maintain WHOIS databases of registrant contact information and it is thus them who will be maintaining a multi-script/multi-linguistic database. This will only be possible, as pointed out by Recommendation 1, once a Whois or any replacement system, such as the Registration Data Access Protocol (RDAP) is in place allowing for storing and displaying non-ASCII datasets. The Registries would have to assure that the data fields present in their contact information database are ‘consistent to standards in the Registrar Accreditation Agreement (RAA), relevant Consensus Policy, Additional Whois Information Policy (AWIP) and any other applicable polices.’ In addition, if a ‘Whois replacement system is capable of displaying more than one data set per registered name holder entry, these data should be presented as additional fields (in addition to the authoritative local script fields provided by the registrant).’ Adopting a WHOIS replacement system may occur costs to Registries, however, no additional will occur from these recommendations.

Intellectual Property Constituency (IPC) and Business Constituency (BC)

The IPC and BC both called for mandatory transformation and/or transliteration of contact information during the WG deliberations. They were the only two constituencies who continuously did so because they argued that a mono-script database would be an integral

³ For an explanation on the difference between thin and thick registry models, see, e.g., the Summary on the [Thick WHOIS PDP project website](#).

part of WHOIS and the DNS, providing transparency and search-ability of any current or future contact information database. These concerns were taken into consideration and the recommendations mean that consistency in data fields will allow for those wishes to contact any registrant to be able to identify which dataset represents name, address, email etc., even if the data itself not submitted in a familiar script. The large number of datasets and the comparatively small number of cases in which translation and/or transformation may be required do not justify a blanket translation/transliteration of all data submitted; as Recommendation 1 states: ‘the burden of transformation lies with the requesting party.’ Therefore, there will be of costs for those seeking to translate/transliterate contact information data but these costs are much smaller – and more proportional, than those that would occur if the translation/transliteration of all data was mandatory.

There is no other impact on Stakeholder Groups and/or Constituencies. It should be noted that registrants will benefit from these recommendation as it will allow them, as soon as the RDAP is in place, to register domain names with contact information in their local script and languages.

4. An Analysis of the period of time that would likely be necessary to implement the policy.

The implementation of these recommendations is dependent on the implementation of a WHOIS replacement system that has non-ASCII capabilities for contact information data. The current status of the RDAP, that would have these capabilities, is moving towards a rollout in the near future.

5. The Advice of any outside advisors relied upon, which should be accompanied by a detailed statement of the advisor’s (i) qualifications and relevant experience; and (ii) potential conflicts of interest.

No outside advisor provided input to the Working Group.

6. The Final Report Submitted to the Council

The Translation and Transliteration Final Report:

- [Final Report](#)
- Translations have been provided in:
 - [العربية](#)
 - [简体中文](#)
 - [Español](#)
 - [Français](#)
 - [Русский](#)
 - [Português](#)

7. A copy of the minutes of the Council deliberation on the policy issue, including all opinions expressed during such deliberation, accompanied by a description of who expressed such opinions.

See <http://gnso.icann.org/en/council/resolutions#20150624-3> - 24 June 2015.

8. Consultations undertaken

External

Shortly after the start of the PDP Working Group, members reached out to ICANN's Supporting Organizations and Advisory Committees as well as the GNSO's Stakeholder Groups and Constituencies to seek input on the Charter questions. See: <file:///Users/lars.hoffmann/Downloads/Public%20comment%20review%20tool%20T&T%20-%2005%20May%202014.pdf>

In line with the PDP Manual, the Initial Report was also published for public comment following its release on 3 March 2014 – see <https://community.icann.org/download/attachments/53777190/Public%20comment%20review%20tool%20TT%20Initial%20Report%20V10.doc?version=1&modificationDate=1432716326000&api=v2>.

The Working Group met in public during ICANN 49, 50, and 51 to report on its process and seek community feedback. Transcripts can be found here:

<https://singapore49.icann.org/en/schedule/mon-transliteration-contact/transcript-transliteration-contact-24mar14-en>
<https://london50.icann.org/en/schedule/wed-transliteration-contact/transcript-transliteration-contact-25jun14-en>
<https://la51.icann.org/en/schedule/mon-transliteration-contact/transcript-transliteration-contact-13oct14-en>

All comments received have been reviewed and considered by the Translation and Transliteration Part D PDP Working Group (See Section 6 of Final Report).

Internal

Regular updates were provided to ICANN Contractual Compliance, General Counsel's Office, and the Registrar Services team. Some of their team members attended WG calls on a regular basis and joined the Group for their face-to-face meetings. Their feedback was very constructive and aided in consensus formation among Working Group members.

9. Summary and Analysis of Public Comment Forum to provide input on the Translation and Transliteration of Contact Information Recommendations, adopted by the GNSO Council prior to ICANN Board consideration.

A public comment forum was opened on 29 June 2015 to solicit feedback on the recommendations prior to ICANN Board consideration. See <https://www.icann.org/public-comments/transliteration-contact-recommendations-2015-06-29-en>.

Six comments were received - see Report of Public Comments. The Registry Stakeholder Group and the Non-Commercial Stakeholder Group both supported all recommendations. The Business Constituency, the Intellectual Property Constituency, International Trademark Association, and the International Federation of Intellectual Property Attorneys all support all recommendations apart from Recommendation 1. All four support the Minority Opinion that formed part of the Final Report; see Report of [Public Comments](#).

10. Impact/Implementation Considerations from ICANN Staff

Staff noted that very little implementation-related work will have to take place from its side. Contractual obligations with regard to data verification and validation remain unaffected for Registrars and Registries. ICANN Compliance will have to assure that non-ASCII contact information, if/when it can be submitted to a WHOIS replacement system, is subject to the same validation/verification as is the case under the status quo. This also extends to the consistency of data fields and the detectability of language and script used – to facilitate search ability and transparency of any future database containing non-ASCII entries.

Staff notes, that the GNSO is in the process to commence a Working Group, that will pick up the work from the [Expert Working Group on gTLD Directory Services](#), through an ICANN Board-launched PDP. The outcome of that PDP must take into consideration the recommendations from Translation and Transliteration PDP Working Group and any reforms to the WHOIS system should not adversely affect future submission of contact information data in non-ASCII scripts and/or languages. In this context staff highlights that the WG provided suggestion on future policy work [highlight in the original]:

- Should data in a Whois replacement system be **machine-readable**?
- If transformation is ever carried out, **transformation standards** would be required to avoid discrepancies between the original and transformed data sets.
- Should the language of non-Latin Whois data fields be indicated ("**marked**")? If so, is there a better solution than tagging?
- Is the registrant's **consent** required before a transformed version of Whois data is published in Whois?
- Is a **Whois verification** required every time a transformed field is updated?
- What are the responsibilities on registrants and registrars as regards **contactability**?

Annex A: Extract from the Translation and Transliteration PDP WG Final Report

5.1 Deliberation on the two main Charter questions

Charter Q1: Is it desirable to translate contact information to a single common language or transliterate contact information to a single common script?

A key issue that emerged early on in the Working Group's discussion was the agreement that their recommendation should bear in mind that the main purpose of transformed⁴ data is to allow those not familiar with the original script of a contact information entry, to contact the registrant. This means that the accuracy of contact information data that are entered and displayed is paramount. There was, however, some divergence in the Working Group about whether the need for accuracy is an argument in favour of transformation or not – and this is also reflected in the section below as well as the public comments received (see 'Community Input' below).

To demonstrate how the Working Group arrived at its recommendations, the following summary provides both the arguments in favour of and opposing mandatory transformation.

5.1.1 Working Group's arguments supporting mandatory transformation of contact information in all generic top-level domains

Some of the issues raised by those supporting mandatory transformation include:

- Mandatory transformation of all contact information into a single script would allow for a transparent, accessible and, arguably, more easily searchable⁵ database. Currently all data returned from the Whois database in generic top level domains (gTLDs) are provided in ASCII and such uniformity renders it a very useful global resource. Having a database with a potentially unlimited number of scripts/languages might create logistical problems in the long run.
- Transformation would to some extent facilitate communication among stakeholders not sharing the same language. Good communication inspires confidence in the

⁴ 'Transformed' is used throughout this report to mean 'translated and/or transliterated'; similarly 'transformation' means 'translation and/or transliteration'.

⁵ The AGB defines "searchable" on p.113:

A Searchable Whois service: Whois service includes web-based search capabilities by domain name, registrant name, postal address, contact names, registrar IDs, and Internet Protocol addresses without arbitrary limit. Boolean search capabilities may be offered. The service shall include appropriate precautions to avoid abuse of this feature (e.g., limiting access to legitimate authorized users), and the application demonstrates compliance with any applicable privacy laws or policies.

Internet and makes bad practices more difficult. At this stage ASCII/English are the most common script/language choices. However, it should be noted that already today many users of the Internet do not share English as a common language or the Latin script as a common script. The number of such users will grow substantially as Internet access and use continue to expand across countries/continents and so the dominant use of English might deter the participation of those not confident in or familiar with it.

- For law enforcement purposes, when Whois results are compared and cross-referenced, it may be easier to ascertain whether the same registrant is the domain holder for different names if the contact information are transformed according to standards.
- Mandatory transformation would avoid possible flight by bad actors to the least translatable languages⁶.
- The main burden (financial or otherwise) to provide data in ASCII should lie on the parties collecting and maintaining the information (i.e. registrar, registry, reseller) because the maintenance of an accessible registration database is their responsibility and should be part of doing business.
- A mono-lingual / mono-script Whois database would enable the listing of all domain names registered by a specific entity (e.g., identifying all domain names registered to a recently merged company).
- Transformation would facilitate identification of and response to fraudulent use of legitimate data for domain names belonging to another registrant (using Reverse Query on identity-valid data).

Please note that these arguments do not necessarily reflect the consensus view of the Working Group's members. However, they inform the Working Group's deliberations - and summaries of the reactions to these arguments are reflected in the Public Comment Review tool (Annex B).

5.1.2 Working Group's arguments opposing mandatory transformation of contact information in all generic top-level domains

Some of the issues raised by those opposing mandatory transformation include:

⁶ However, it should be noted that transformation tools may not exist for such languages and so transformation would need to be manual until they did. It would be difficult to limit languages to e.g. only the UN ones or some other subset.

- Accurate⁷ transformation is very expensive and these recommendations could effectively shift the costs from those requiring the work to registrants, registrars, registries or other parties. Costs would make things disproportionately difficult for small players. Existing automated systems for transformation are inadequate. They do not provide results of sufficient quality for purposes requiring accuracy and cover fewer than 100 languages. Developing systems for languages not covered by transformation tools is slow and expensive, especially in the case of translation tools. For purposes for which accuracy is important, transformation work often needs to be done manually.⁸ For example the translated ‘Bangkok’ is more useful internationally than the transliterated ‘krung thep’. However, the transliterated ‘beijing’ is much more useful than the translated ‘Northern Capital’. Automated systems would not be able to know when to translate and when to transliterate.
- Another consequence of the financial burden of transforming contact information data would be that the expansion of the Internet and provision of its benefits became more difficult, especially in less developed regions that are already lagging behind in terms of Internet access and often don’t use Latin-based scripts.
- It would be near impossible to achieve high levels of accuracy in transforming a very large number of scripts and languages – mostly of proper nouns – into a common script and language. For some languages standards do not exist; for those where there are standards, there may be more than one, for example, for Mandarin, Pinyin and Wade Giles.
- Mandatory transformation would require validation of both the original and transformed contact information every time they change, a potentially costly duplication of effort. Responsibility for accuracy would rest on registrants who may not be qualified to check it. Consistent transformation of contact information data across millions of entries is very difficult to achieve, especially because of the

⁷ “Accuracy” as used in the "Study to Evaluate Available Solutions for the Submission and Display of Internationalized Contact Data" June 2, 2014:

“There are at least three kinds of use the transformed contact data in the DNRD may have in another language or script (based on the level of accuracy of the transformation):

1. Requiring accurate transformation (e.g. valid in a court of law, matching information in a passport, matching information in legal incorporation, etc.)
2. Requiring consistent transformation (allowing use of such information to match other information provided in another context, e.g. to match address information of a registrant on a Google map, etc.)
3. Requiring ad hoc transformation (allowing informal or casual version of the information in another language to provide more general accessibility)”

Both accuracy and consistency would suffer if a large number of actors, for example, registrants, were transforming contact information.

⁸ See: *Study to evaluate available solutions for the submission and display of internationalized contact data* for further information: <https://www.icann.org/en/system/files/files/transform-dnrd-02jun14-en.pdf>

continued globalization of the Internet with an increase in users whose languages are not based on the Latin script. Whois contact information should display what the registrant enters. Original data should be authoritative, verified and validated. Interpretation and transformation may add errors.

- Mandatory transformation into one script could be problematic for or unfair to all those interested parties that do not speak/read/understand that one script. For example, whereas transformation from Mandarin script to a Latin script might be useful to, for example, law enforcement in countries that use Latin scripts, it would be ineffectual to law enforcement in other countries that do not read that Latin script.
- A growing number of registered name holders do not use Latin script, meaning that they lack the language skills to be able to transform their contact information themselves. Therefore, transformation would have to take place at a later stage, through the registrar or the registry. Considering the number of domain names in all gTLDs this would lead to considerable costs not justified by benefits to others and be detrimental to accuracy and consistency – key factors for collecting registered name holders’ contact information data in the first place.
- The usability of transformed data is questionable because registered name holders unfamiliar with Latin script would not be able to communicate in Latin script, even if their contact information was transformed and thus accessible to those using Latin script.
- It would be more convenient to allow registration information data to be entered by the registered domain holders in their local script and the relevant data fields to be transformed⁹ into Latin script by either the registrar or the registry. Such transformation by the registrar or registry would provide greater accuracy in facilitating those wishing to contact name holders to identify their email and/or postal address. A similar method is already in place for some of the country code top

⁹ “Transformation” on its own is used to refer to contact information, not fields, in this report. A future system could provide field names in, for example, the six UN languages and a consistent central depository of field names in additional languages for those registrars et al. that require them for display for various markets.

level domains (ccTLDs):

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Domain Name: example.cn
ROID: 20050505s10001s11652376-cn
Domain Status: clientDeleteProhibited
Domain Status: clientUpdateProhibited
Domain Status: clientTransferProhibited
Registrant ID: agent2899-0
Registrant: 中信安控科技股份有限公司
Registrant Contact Email: zxakkj@163.com
Sponsoring Registrar: Canada 001 names Ltd.
Name Server: dns8.66.cn
Name Server: dns9.66.cn
Registration Date: 2005-05-05 05:38:46
Expiration Date: 2022-05-05 05:38:46
DNSSEC: unsigned
LAHO-2819:~ lars.hoffmann$ whois test.cn
Domain Name: test.cn
ROID: 20030312s10001s00063170-cn
Domain Status: clientDeleteProhibited
Domain Status: clientUpdateProhibited
Domain Status: clientTransferProhibited
Registrant ID: xq317v49978fop
Registrant: 北京慧思德科技有限公司
Registrant Contact Email: info@wisdom.com.cn
Sponsoring Registrar: 北京新网数码信息技术有限公司
Name Server: ns15.xincache.com
Name Server: ns16.xincache.com
Registration Date: 2003-03-17 12:20:05
Expiration Date: 2020-03-17 12:48:36
DNSSEC: unsigned
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- The burden (financial and otherwise) of accessing and understanding contact information is best placed on the side of the beneficiary of such data – i.e. the data requestor.
- Requiring domain name holders to submit data in a script they are not familiar with (be it ASCII or any other) could potentially lead to contractual breaches beyond the registrants' control as they would not be able to verify autonomously the transformed version of the data they submitted.

The arguments here mostly reflect the Working Group members' consensus views, for a detailed summary of members' views and reactions to these arguments, please see the Public Comment Review Tool (Annex B).

Charter Q2: Who should decide who should bear the burden [of] translating contact information to a single common language or transliterating contact information to a single common script?

The Working Group spent most of its time debating the first Charter question as the answer to this second Charter question is dependent on the outcome of the first. At this stage, the Working Group believes that if mandatory translation and/or transliteration were recommended, the burden of translation/transliteration would probably fall to the operating registrars who would be likely to pass on these additional costs to their registrants.

5.1.3 Issue of Cost

In its Charter, the Working Group was encouraged to discuss the issue of cost in the event of transforming contact information data into one single script. This section provides an overview of the discussion.

In general, those supporting mandatory transformation have argued that costs should be born by those maintaining the data (registries, registrars, resellers); those that have opposed mandatory transformation have stated that any transformation costs should be born by those requesting the (transformed) data.

It is clear that blanket transformation of information data would incur large costs – it is likely that any manual transformation¹⁰ would cost a significant amount. Enquiries with ICANN’s translation department show that transformations under 100 words currently cost a flat fee of between 25 and 75 US\$ - depending on the language/script from which the transformation is sought. Such blanket transformation, at a significant cost, would seem inappropriate also because only a small fraction of such contact information data is ever requested and an even smaller fraction would require transformation.

Comments from both Working Group members (during discussions) and stakeholders (through public comments) have pointed out that the costs for mandatory transformation are likely to be passed on to registrants and in addition, such costs would hit especially those registrants, registrars and registries in poorer regions, in which costs can be a very significant market entry barrier. The need for creating new data fields (for transformed data) and significantly overhauling the operational process (to allow for transforming data and then

¹⁰ Manual referring to transformation by a human as opposed to a machine transformation (such as Bing, Google Translate or other services).

verifying them) would add to the financial burden of mandating transformation of contact information.

5.2. Rationale and Recommendations

5.2.1 Rationale

Reliable automated transliteration is not available for non-alphabetic scripts¹¹ and is unlikely to be available for a considerable time. See *Study to evaluate available solutions for the submission and display of internationalized contact data / ICANN IRD Study Team* for further information.

Many alphabetic scripts¹² and syllabaries¹³ do not indicate all vowels or word boundaries, and so cannot be losslessly transliterated.

In all of these cases, manual transliteration will be required.

Transliteration of alphabetic scripts¹⁴ would not indicate, for example, streets, roads, buildings etc., which would ideally be translated. The Working Group is unaware of upcoming sophisticated transformation tools which know when to transliterate and when to translate.

Manual transformation could solve some of the problems outlined above, but it is slow and expensive and should be conducted centrally to avoid consistency problems arising from transformation implemented in different ways by many actors.

As regards accessibility, data in their original form, as long as they are machine-readable, are more easily and consistently searchable.

5.2.2 Recommendations

Recommendation #1 The Working Group recommends that it is not desirable to make transformation of contact information mandatory. Any parties requiring transformation are free to do so on an *ad hoc* basis outside Whois or any replacement system, such as the Registration Data Access Protocol (RDAP). If not undertaken voluntarily by registrar/registry (see Recommendation #5), the burden of transformation lies with the requesting party.

Level of consensus: Consensus

Minority Recommendation #1:

11 e.g. Chinese and Japanese

12 e.g. Arabic and Hebrew

13 e.g. Hindi and other Indian scripts

14 e.g. Cyrillic and Greek

Working Group member Petter Rindforth, in line with the position taken by his Constituency, the Intellectual Property Constituency (ICP),¹⁵ recommends mandatory translation and/or transliteration (transformation) of contact information in all generic top-level domains (gTLDs).

Although he agrees that there are situations where the contact information in the local language of the registrant is the primary version, such as to identify the registrant in preparation for a local legal action, there are a number of situations where a global WHOIS search, providing access to data in as uniform a fashion as possible, is necessary for the data registration service to achieve its goals of providing transparency and accountability in the DNS. See also 5.1.1 explaining the Working Group's arguments supporting mandatory transformation of contact information in all generic top-level domains. Please note that Petter Rindforth **supports Recommendations #2 -7 as these recommendations are suitable and important independently of a situation where transformation of contact information is mandatory or not.**

Recommendation #2 Whilst noting that a Whois replacement system should be capable of receiving input in the form of non-ASCII script contact information, the Working Group recommends its data fields be stored and displayed in a way that allows for easy identification of what the different data entries represent and what language(s)/script(s) have been used by the registered name holder.

Level of consensus: Full Consensus

Recommendation #3 The Working Group recommends that the language(s) and script(s) supported for registrants to submit their contact information data may be chosen in accordance with gTLD-provider business models.

Level of consensus: Full Consensus

Recommendation #4 The Working Group recommends that, regardless of the language(s)/script(s) used, it is assured that the data fields are consistent to standards in the Registrar Accreditation Agreement (RAA), relevant L Policy, Additional Whois Information Policy (AWIP) and any other applicable policies. Entered contact information data are validated, in accordance with the aforementioned Policies and Agreements and the language/script used must be easily identifiable.

¹⁵ see also 5.1.1 and the Public Comment Review Tool (Annex B).

Level of consensus: Full Consensus

Recommendation #5 The Working Group recommends that if the transformation of contact information is performed, and if the Whois replacement system is capable of displaying more than one data set per registered name holder entry, these data should be presented as additional fields (in addition to the authoritative local script fields provided by the registrant) and that these fields be marked as transformed and their source(s) indicated.

Level of consensus: Full Consensus

Recommendation #6 The Working Group recommends that any Whois replacement system, for example RDAP, remains flexible so that contact information in new scripts/languages can be added and expand its linguistic/script capacity for receiving, storing and displaying contact information data.

Recommendation #7 The Working Group recommends that these recommendations are coordinated with other Whois modifications where necessary and are implemented and/or applied as soon as a Whois replacement system that can receive, store and display non-ASCII characters, becomes operational.

Level of consensus: Full Consensus

Finding in relation to Charter question 2: Based on recommendations #1-#7, the question of who should decide who should bear the burden of translating or transliterating contact information to a single common script is moot.